

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re :  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : Chapter 11 Case No.  
Debtors. : 08-13555 (JMP)  
: (Jointly Administered)  
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AFFIDAVIT AND DISCLOSURE STATEMENT OF Paul Anthony Connelly  
ON BEHALF OF International Legal Counsellors Thailand Limited

STATE OF Bangkok, Thailand )  
COUNTY OF Sathorn District ) ss:  
)

Paul Anthony Connelly, being duly sworn, upon his oath, deposes and says:

1. I am a Partner of International Legal Counsellors Thailand Limited, located at 175 Sathorn City Tower, 18<sup>th</sup> Floor, South Sathorn Road, Tungmahamek Sub-district, Sathorn District, Bangkok 10120, Thailand (the "Firm").

2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors") and, collectively with their non-debtor affiliates, "Lehman"), have requested that the Firm provide Thai law legal services to the Debtors, and the Firm has consented to provide such services.

3. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom

may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

4. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm.

5. Neither I, nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates.

6. The Debtors owe the Firm \$0.00 for prepetition services.

By: 

Subscribed and sworn to before me  
this 29<sup>th</sup> day of May, 2009



Mr. Supoj Boonyavanich  
Notarial Services Attorney



Reg. No./ทะเบียนเลขที่ 2567/2548

Commission Expires/ทะเบียนหมดอายุ

Date/วันที่ November 20, 2009

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RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN  
BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively,  
the "Debtors")

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.  
RETURN IT FOR FILING BY THE DEBTORS, TO:

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10153  
Attn: Jennifer Sapp  
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as  
appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

International Legal Counsellors Thailand Limited

175 Sathorn City Tower, 18<sup>th</sup> Floor

Tungmahamek Sub-district, Sathorn District

Bangkok 10120, Thailand

2. Date of retention: May 28, 2009

3. Type of services provided (accounting, legal, etc.):

legal

4. Brief description of services to be provided:

Thai law legal advice in respect of the restructuring, funding for assets,  
negotiations with creditors.

5. Arrangements for compensation (hourly, contingent, etc.)

Hourly – maximum hourly rate is US\$275.00

- (a) Average hourly rate (if applicable):

not applicable

- (b) Estimated average monthly compensation based on prepetition  
retention (if firm was employed prepetition):

not applicable

6. Prepetition claims against the Debtors held by the firm:

Amount of claim: \$ none

Date claim arose: none

Source of Claim: none

7. Prepetition claims against the Debtors held individually by any member,  
associate, or professional employee of the firm:

Name: none

Status: none

Amount of Claim: \$ none

Date claim arose: none

Source of claim: not applicable

8. Stock of the Debtors currently held by the firm:

Kind of shares: not applicable

No. of shares: none

9. Stock of the Debtors currently held individually by any member, associate, or professional employee of the firm:

Name: not applicable

Status: \_\_\_\_\_

Kind of shares: \_\_\_\_\_

No. of shares: none

10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.

No adverse interest

11. Name of individual completing this form:

Paul Anthony Connelly, Partner,

International Legal Counsellors Thailand Limited